

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

Roger A. Herndon, on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

Huntington Ingalls Industries, Inc., the HII  
Administrative Committee, and John/Jane Does 1–5,

Defendants.

Civil Action No.: 4:19-cv-00052-RCY-  
LRL

CLASS ACTION

**PLAINTIFF’S MOTION FOR ATTORNEYS’ FEES, COSTS, EXPENSES AND  
A CASE CONTRIBUTION AWARD**

Plaintiff Roger A. Herndon, individually and on behalf of all other members of the Settlement Class, hereby moves this Court for an Order awarding \$700,000 (25% of the Settlement Fund), \$305,376.98 in litigation costs and expenses, and a case contribution award of \$10,000 to Mr. Herndon. A [Proposed] Final Order is attached as Exhibit A hereto.

In support of this Motion, Plaintiff submits the accompanying Memorandum of Law and the Declaration of Douglas P. Needham with an attached exhibit.

Dated: March 25, 2022

Respectfully submitted,

/s/ Gregory Y. Porter

Gregory Y. Porter (VSB # 40408)

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**CERTIFICATE OF SERVICE**

I certify that on March 25, 2022, the foregoing was served through this Court's CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Gregory Y. Porter  
Gregory Y. Porter (VSB # 40408)